

# Exhibit F

(previously filed as Dkt. 660-6)

1  
2 UNITED STATES DISTRICT COURT  
3 EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

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4 UNITED STATES, et al.,

5 Plaintiffs,

6 -against-

7 GOOGLE LLC,

8 Defendant.

9 No: 1:23-cv-00108-LMB-JFA

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10 September 28, 2023

11 10:04 a.m.

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14  
15  
16 DEPOSITION of SIMON WHITCOMBE,  
17 taken by Defendant, pursuant to Notice,  
18 held at the offices of COVINGTON & BURLING  
19 LLP, 620 Eighth Avenue, New York, New York  
20 before Wayne Hock, a Notary Public of the  
21 State of New York.

22  
23  
24  
25 Job No. CS6114685

<p style="text-align: right;">Page 190</p> <p>1 S. Whitcombe</p> <p>2 is we compete with programmatic, but</p> <p>3 generally speaking, particularly on</p> <p>4 lower funnel which is the majority of</p> <p>5 the revenue that we generate from</p> <p>6 advertising at Meta, we perform more</p> <p>7 competitively than programmatic</p> <p>8 generally. And again, when</p> <p>9 advertisers allocate budget on</p> <p>10 performance, you know, we do very well</p> <p>11 generally versus programmatic. And</p> <p>12 that's why you see in a lot of these</p> <p>13 documents the search and YouTube and</p> <p>14 maybe Tik Tok, that's an area on upper</p> <p>15 funnel and lower funnel where we're</p> <p>16 not consistently performing better.</p> <p>17 It's -- it may be we'll change</p> <p>18 depending on an advertiser or the way</p> <p>19 that they think about measurement or</p> <p>20 -- it's a much less cut and dry.</p> <p>21 Q. But just for publisher ad</p> <p>22 servers specifically, you almost never</p> <p>23 hear that Meta's owned and operated</p> <p>24 properties are competing with publishers'</p> <p>25 ad servers; correct?</p>	<p style="text-align: right;">Page 192</p> <p>1 S. Whitcombe</p> <p>2 an advertising sales leader for Facebook,</p> <p>3 you've never had to educate yourself about</p> <p>4 DSPs in detail; is that correct?</p> <p>5 A. That's correct.</p> <p>6 MR. BITTON: Objection to form.</p> <p>7 Leading.</p> <p>8 Q. Can you identify any DSPs other</p> <p>9 than The Trade Desk?</p> <p>10 A. No.</p> <p>11 Q. Have you ever heard of</p> <p>12 MediaMath?</p> <p>13 A. Oh, yeah, I've heard of</p> <p>14 MediaMath, yeah.</p> <p>15 Q. Is MediaMath a DSP?</p> <p>16 A. I don't know. And again, we</p> <p>17 don't -- that's not anything that we -- we</p> <p>18 don't go -- we look at the market through</p> <p>19 a lens of programmatic. We don't get to</p> <p>20 that level of detail.</p> <p>21 Q. Have you ever heard that an</p> <p>22 advertiser is switching budgets between</p> <p>23 MediaMath and Meta?</p> <p>24 MR. BITTON: Objection to form.</p> <p>25 THE WITNESS: No.</p>
<p style="text-align: right;">Page 191</p> <p>1 S. Whitcombe</p> <p>2 MR. BITTON: Objection to form.</p> <p>3 Lacks foundation. Vague. Outside the</p> <p>4 scope.</p> <p>5 THE WITNESS: It's not something</p> <p>6 that comes up often or really ever.</p> <p>7 Q. Let me you ask a little bit</p> <p>8 about DSPs or demand side platforms.</p> <p>9 Does that make sense?</p> <p>10 A. Yes.</p> <p>11 Q. I think you mentioned The Trade</p> <p>12 Desk.</p> <p>13 Is that a demand side platform?</p> <p>14 MR. BITTON: Objection to form.</p> <p>15 Lacks foundation.</p> <p>16 THE WITNESS: Again, as we go to</p> <p>17 market, I don't work in ad tech and I</p> <p>18 don't have a deep understanding of ad</p> <p>19 tech. I think we think of that</p> <p>20 category as we go to market as a very</p> <p>21 large bucket of programmatic, and we</p> <p>22 don't -- I don't have a deep</p> <p>23 understanding of DSPs or that segment</p> <p>24 of the market.</p> <p>25 Q. Fair to say that, in your job as</p>	<p style="text-align: right;">Page 193</p> <p>1 S. Whitcombe</p> <p>2 Q. Were you aware that MediaMath</p> <p>3 went bankrupt in June of 2023?</p> <p>4 MR. BITTON: Objection to form.</p> <p>5 THE WITNESS: I do recall</p> <p>6 reading about MediaMath going out of</p> <p>7 business, yes.</p> <p>8 Q. Can you identify any specific</p> <p>9 impact that MediaMath's bankruptcy had on</p> <p>10 Meta's advertising business?</p> <p>11 MR. BITTON: Objection to form.</p> <p>12 Lacks foundation.</p> <p>13 THE WITNESS: Again, no. And</p> <p>14 again, I think part of that is that a</p> <p>15 majority of the revenue that we see</p> <p>16 from advertising is direct response</p> <p>17 advertising, very performance-focused</p> <p>18 advertising. And generally, against</p> <p>19 all programmatic, we perform very,</p> <p>20 very competitively.</p> <p>21 Q. What impact did -- if any, did</p> <p>22 MediaMath's bankruptcy have on Meta's</p> <p>23 advertising business?</p> <p>24 MR. BITTON: Objection to form.</p> <p>25 Asked and answered. Lacks foundation.</p>

<p style="text-align: right;">Page 194</p> <p>1 S. Whitcombe</p> <p>2 MS. PATCHEN: Objection. Asked</p> <p>3 and answered.</p> <p>4 THE WITNESS: No noticeable</p> <p>5 impact that I'm aware of.</p> <p>6 Q. Have you ever heard of The Trade</p> <p>7 Desk's OpenPath product?</p> <p>8 A. No.</p> <p>9 Q. What impact, if any, did The</p> <p>10 Trade Desk launching OpenPath have on</p> <p>11 Meta's advertising business?</p> <p>12 MR. BITTON: Objection to form.</p> <p>13 Lacks foundation.</p> <p>14 MS. PATCHEN: Objection. Same.</p> <p>15 THE WITNESS: I wouldn't know</p> <p>16 and yeah, none that I know of.</p> <p>17 Q. Are you familiar with Yahoo's</p> <p>18 Gemini ad network?</p> <p>19 A. No.</p> <p>20 Q. Were you aware that Yahoo has</p> <p>21 announced that it was shutting down the</p> <p>22 Gemini network?</p> <p>23 A. I was not aware.</p> <p>24 MR. BITTON: Objection to form.</p> <p>25 Lacks foundation.</p>	<p style="text-align: right;">Page 196</p> <p>1 S. Whitcombe</p> <p>2 Q. You're aware that some exchanges</p> <p>3 have lowered their take rates in recent</p> <p>4 years?</p> <p>5 MR. BITTON: Objection to form.</p> <p>6 Lacks foundation.</p> <p>7 THE WITNESS: No.</p> <p>8 Q. When exchanges lowered their</p> <p>9 take rates in recent years, did that</p> <p>10 affect the price of ads sold on Meta's</p> <p>11 platform?</p> <p>12 MR. BITTON: Objection to</p> <p>13 fortunately. Lacks foundation.</p> <p>14 MS. PATCHEN: Objection. Same.</p> <p>15 MR. BITTON: Leading.</p> <p>16 THE WITNESS: I'm not aware of</p> <p>17 it impacting our auction, no.</p> <p>18 Q. Can you identify any specific</p> <p>19 advertisers who moved some or all of their</p> <p>20 budgets from Meta to exchanges when</p> <p>21 exchanges lowered their take rates?</p> <p>22 MR. BITTON: Objection to form.</p> <p>23 Lacks foundation. Leading.</p> <p>24 THE WITNESS: That's a level of</p> <p>25 granularity on programmatic</p>
<p style="text-align: right;">Page 195</p> <p>1 S. Whitcombe</p> <p>2 Q. What impact, if any, is Yahoo's</p> <p>3 -- does Yahoo's announcement that it is</p> <p>4 shutting down the Gemini ad network have</p> <p>5 on Meta's advertising business?</p> <p>6 MR. BITTON: Objection to form.</p> <p>7 Lacks foundation. Leading.</p> <p>8 MS. PATCHEN: Objection. Same.</p> <p>9 THE WITNESS: No impact that I'm</p> <p>10 aware of.</p> <p>11 Q. Yahoo also recently announced</p> <p>12 that it's closing its exchange.</p> <p>13 Do you know that?</p> <p>14 MR. BITTON: Objection to form.</p> <p>15 Lacks foundation.</p> <p>16 THE WITNESS: I did not know</p> <p>17 that.</p> <p>18 Q. What impact, if any, did Yahoo</p> <p>19 closing its exchange have on Meta's</p> <p>20 advertising business?</p> <p>21 MR. BITTON: Objection to form.</p> <p>22 Lacks foundation.</p> <p>23 MS. PATCHEN: Objection. Same.</p> <p>24 THE WITNESS: None that I'm</p> <p>25 aware of.</p>	<p style="text-align: right;">Page 197</p> <p>1 S. Whitcombe</p> <p>2 advertising that I simply don't have.</p> <p>3 Q. Fair to say that, as a sales</p> <p>4 leader for Meta's advertising business,</p> <p>5 you haven't felt the need to educate</p> <p>6 yourself about how exchanges work; is that</p> <p>7 correct?</p> <p>8 MR. BITTON: Objection to form.</p> <p>9 MS. PATCHEN: Objection.</p> <p>10 Is he testifying as the</p> <p>11 corporate representative now or in his</p> <p>12 personal capacity?</p> <p>13 MR. VERNON: Both.</p> <p>14 MR. BITTON: Objection to form.</p> <p>15 Lacks foundation. Outside the scope.</p> <p>16 Leading.</p> <p>17 THE WITNESS: I go back to what</p> <p>18 I said earlier. Generally our direct</p> <p>19 response solutions perform very, very</p> <p>20 competitively against programmatic</p> <p>21 solutions, you know, for many,</p> <p>22 arguably most advertisers. We're able</p> <p>23 to drive a better performance than</p> <p>24 they see in programmatic, and as a</p> <p>25 result, it does not come up a huge</p>

<p style="text-align: right;">Page 198</p> <p>1 S. Whitcombe</p> <p>2 amount and it hasn't required me to</p> <p>3 have a very deep understanding of</p> <p>4 exactly how it works.</p> <p>5 Q. You were aware that some</p> <p>6 exchanges will do deals with particular</p> <p>7 publishers or advertisers under which the</p> <p>8 exchange agrees to lower its take rate for</p> <p>9 that particular publisher or advertiser?</p> <p>10 A. No.</p> <p>11 MR. BITTON: Objection to form.</p> <p>12 Lacks foundation. Leading.</p> <p>13 Q. Can you identify any specific</p> <p>14 advertisers who moved some or all of their</p> <p>15 advertising budgets to Meta -- I'm sorry,</p> <p>16 from Meta to exchanges because exchanges</p> <p>17 lowered their take rates or a specific</p> <p>18 publisher or advertiser?</p> <p>19 MR. BITTON: Objection to form.</p> <p>20 Lacks foundation. Leading.</p> <p>21 THE WITNESS: No.</p> <p>22 Q. What impact, if any, has</p> <p>23 exchanges lowering their take rates for</p> <p>24 specific publishers or advertisers had on</p> <p>25 Meta's advertising business?</p>	<p style="text-align: right;">Page 200</p> <p>1 S. Whitcombe</p> <p>2 Lacks foundation. Calls for</p> <p>3 speculation. Leading.</p> <p>4 THE WITNESS: I don't think the</p> <p>5 exchanges taking -- changing their</p> <p>6 take rate -- ultimately advertisers</p> <p>7 will make a decision on where they</p> <p>8 place their budgets based on the</p> <p>9 performance metric that they care</p> <p>10 about.</p> <p>11 Now, if exchanges changing their</p> <p>12 take rate was important and budgets</p> <p>13 were moving in that direction across</p> <p>14 the book of business that I'm</p> <p>15 responsible for, I would think I would</p> <p>16 be aware of that, but that has not</p> <p>17 come up in my capacity.</p> <p>18 Q. So I guess it would be fair to</p> <p>19 say that you're not in a good position to</p> <p>20 testify based on personal knowledge about</p> <p>21 whether advertisers would or would not</p> <p>22 switch between Meta and exchanges if</p> <p>23 exchanges change their take rate; is that</p> <p>24 fair?</p> <p>25 MR. BITTON: Objection to form.</p>
<p style="text-align: right;">Page 199</p> <p>1 S. Whitcombe</p> <p>2 MR. BITTON: Objection to form.</p> <p>3 Lacks foundation. Leading.</p> <p>4 THE WITNESS: Again, nothing I'm</p> <p>5 aware of.</p> <p>6 Q. Is it fair to say that you are</p> <p>7 not in a good position to testify based on</p> <p>8 personal knowledge about whether</p> <p>9 advertisers would switch between Meta and</p> <p>10 exchanges if exchanges change their take</p> <p>11 rates?</p> <p>12 MR. BITTON: Objection to form.</p> <p>13 Lacks foundation. Calls for</p> <p>14 speculation. Leading.</p> <p>15 MS. PATCHEN: Objection.</p> <p>16 THE WITNESS: Can you repeat the</p> <p>17 question?</p> <p>18 Q. Sure.</p> <p>19 Is it fair to say that you're</p> <p>20 not in a good position to testify based on</p> <p>21 personal knowledge about whether</p> <p>22 advertisers would switch between Meta and</p> <p>23 exchanges if exchanges change their take</p> <p>24 rates?</p> <p>25 MR. BITTON: Objection to form.</p>	<p style="text-align: right;">Page 201</p> <p>1 S. Whitcombe</p> <p>2 Leading. Calls for speculation.</p> <p>3 Lacks foundation.</p> <p>4 THE WITNESS: Again, I don't</p> <p>5 necessarily know how I should answer</p> <p>6 that question.</p> <p>7 If advertisers were moving</p> <p>8 budgets, moving significant budgets</p> <p>9 between Meta and programmatic, I would</p> <p>10 have an understanding of that. That</p> <p>11 simply isn't the case. And if we were</p> <p>12 losing significant budgets to</p> <p>13 programmatic because of take rates,</p> <p>14 again I think I would have an</p> <p>15 understanding of that, but I don't</p> <p>16 think that we are.</p> <p>17 Q. Why do you say that you don't</p> <p>18 believe Facebook is losing significant</p> <p>19 budgets to programmatic because of take</p> <p>20 rates?</p> <p>21 MR. BITTON: Objection to form.</p> <p>22 THE WITNESS: Because generally</p> <p>23 on direct response advertising Meta</p> <p>24 advertising consistently, based on</p> <p>25 advertiser feedback, drives better ROI</p>

<p style="text-align: right;">Page 202</p> <p>1 S. Whitcombe</p> <p>2 than programmatic.</p> <p>3 Q. And so it's your experience that</p> <p>4 advertisers, at least based on what you've</p> <p>5 heard, advertisers are not moving</p> <p>6 significant budgets between Meta and</p> <p>7 programmatic; is that right?</p> <p>8 MR. BITTON: Objection.</p> <p>9 Mischaracterizes the testimony. Lacks</p> <p>10 foundation. Leading.</p> <p>11 THE WITNESS: To my</p> <p>12 understanding, I would say yes.</p> <p>13 Q. Have you heard of header</p> <p>14 bidding?</p> <p>15 A. I've heard of it. I don't have</p> <p>16 a deep understanding of it, no.</p> <p>17 Q. What impact, if any, did header</p> <p>18 bidding have on Meta's advertising</p> <p>19 business?</p> <p>20 MR. BITTON: Objection to form.</p> <p>21 Lacks foundation. Leading.</p> <p>22 THE WITNESS: None, none that</p> <p>23 I'm aware of.</p> <p>24 Q. Will have you ever heard of</p> <p>25 Google's Open Bidding?</p>	<p style="text-align: right;">Page 204</p> <p>1 S. Whitcombe</p> <p>2 advertisers look at ROI, search is very,</p> <p>3 very competitive with the solutions that</p> <p>4 we offer. And advertisers tend to move</p> <p>5 budgets based upon performance.</p> <p>6 Q. So it sounds like you're saying</p> <p>7 that, based upon what you hear,</p> <p>8 advertisers shift budgets between search</p> <p>9 and Meta more than they shift budgets</p> <p>10 between Meta and programmatic? Did I hear</p> <p>11 that correctly?</p> <p>12 MR. BITTON: Objection to form.</p> <p>13 Leading. Mischaracterizes the</p> <p>14 testimony. Lacks foundation.</p> <p>15 THE WITNESS: I would say</p> <p>16 generally I hear, yes, that would be</p> <p>17 the case.</p> <p>18 Q. Okay.</p> <p>19 In the last few years, open</p> <p>20 auction display advertising has shifted</p> <p>21 from a second price auction to a first</p> <p>22 price auction.</p> <p>23 Are you aware of that?</p> <p>24 MR. BITTON: Objection to form.</p> <p>25 Leading. Lacks foundation.</p>
<p style="text-align: right;">Page 203</p> <p>1 S. Whitcombe</p> <p>2 A. I have not.</p> <p>3 Q. What impact, if any, did Google</p> <p>4 launching Open Bidding have on Meta's</p> <p>5 advertising business?</p> <p>6 MS. PATCHEN: Objection. Calls</p> <p>7 for speculation.</p> <p>8 MR. BITTON: Objection to form.</p> <p>9 Lacks foundation.</p> <p>10 THE WITNESS: I'm not aware of</p> <p>11 any, and I go back to my previous</p> <p>12 answer on this, which is on</p> <p>13 programmatic advertising, we tend to</p> <p>14 be very competitive on a side-by-side</p> <p>15 ROI basis with programmatic. With</p> <p>16 search and other forms of direct</p> <p>17 response media, it's much more</p> <p>18 competitive. So search will come up</p> <p>19 more often, much more often than</p> <p>20 programmatic.</p> <p>21 Q. Why do you say that search comes</p> <p>22 up much more often than programmatic?</p> <p>23 A. Because generally across the</p> <p>24 advertisers or the partners that I</p> <p>25 oversee, on a side-by-side basis when</p>	<p style="text-align: right;">Page 205</p> <p>1 S. Whitcombe</p> <p>2 THE WITNESS: No, I'm not aware</p> <p>3 of that.</p> <p>4 Q. What impact, if any, did open</p> <p>5 auction display's shift from a second</p> <p>6 price auction to a first price auction</p> <p>7 have on Meta's advertising business?</p> <p>8 MS. PATCHEN: Objection. Calls</p> <p>9 for speculation.</p> <p>10 MR. BITTON: Objection to form.</p> <p>11 Lacks foundation. Leading.</p> <p>12 THE WITNESS: I don't know of</p> <p>13 any significant impact in terms of the</p> <p>14 overarching performance of</p> <p>15 programmatic because of that change,</p> <p>16 certainly versus Meta solutions.</p> <p>17 Q. Is it fair to say that changes</p> <p>18 in how competition works in open auction</p> <p>19 display don't, based upon what you hear,</p> <p>20 have a significant impact on Meta's</p> <p>21 advertising business?</p> <p>22 MR. BITTON: Objection to form.</p> <p>23 Lacks foundation. Mischaracterizes</p> <p>24 the testimony. Leading.</p> <p>25 THE WITNESS: Could you say that</p>

<p style="text-align: right;">Page 206</p> <p>1 S. Whitcombe</p> <p>2 one more time, I'm sorry?</p> <p>3 Q. Sure.</p> <p>4 Is it fair to say that, just</p> <p>5 based on what you hear in your job, that</p> <p>6 changes in how competition works in open</p> <p>7 auction display do not have a significant</p> <p>8 impact on Meta's advertising business?</p> <p>9 MR. BITTON: Objection to form.</p> <p>10 Lacks foundation. Leading.</p> <p>11 Mischaracterizes the testimony.</p> <p>12 THE WITNESS: Yeah, I'm not</p> <p>13 aware of any impact.</p> <p>14 Q. Let me switch topics a little</p> <p>15 bit. Your counsel may object, so I'm</p> <p>16 going to try to do this slowly.</p> <p>17 It's fair to say you're aware,</p> <p>18 just as an individual in the world, there</p> <p>19 is antitrust scrutiny over Meta; is that</p> <p>20 fair?</p> <p>21 MR. BITTON: Objection to form.</p> <p>22 MS. PATCHEN: Objection. Outside</p> <p>23 the scope.</p> <p>24 MR. BITTON: Outside the scope.</p> <p>25 Leading. Lacks foundation.</p>	<p style="text-align: right;">Page 208</p> <p>1 S. Whitcombe</p> <p>2 objection, outside the scope of the</p> <p>3 30(b)(6) topics. Leading. Calls for</p> <p>4 speculation. Calls for legal</p> <p>5 opinions. And lacks foundation.</p> <p>6 THE WITNESS: I don't -- I mean,</p> <p>7 I would not have even thought about it</p> <p>8 through that lens, so no.</p> <p>9 MR. VERNON: Could we show you</p> <p>10 tab fourteen. This will be I think</p> <p>11 Exhibit 22.</p> <p>12 MR. BITTON: Sorry, counsel,</p> <p>13 you're referring to tab fourteen.</p> <p>14 What does that mean?</p> <p>15 MR. VERNON: That was me</p> <p>16 mistakingly referring to our internal</p> <p>17 filing system, but it will be</p> <p>18 Exhibit 22.</p> <p>19 (Whereupon, a document entitled</p> <p>20 Network Bidding Agreement was marked</p> <p>21 Exhibit 22 for identification.)</p> <p>22 Q. Since it's towards the end of</p> <p>23 the day, I'll just tell you I'm only going</p> <p>24 to ask you briefly about the pages ending</p> <p>25 in 348 and 439, which are also numbered 23</p>
<p style="text-align: right;">Page 207</p> <p>1 S. Whitcombe</p> <p>2 THE WITNESS: Yes.</p> <p>3 Q. And it's fair to say that if you</p> <p>4 were to say that display and social are</p> <p>5 separate markets, that would be against</p> <p>6 Facebook's interest with respect to</p> <p>7 antitrust litigation investigations</p> <p>8 relating to Facebook?</p> <p>9 MS. PATCHEN: Objection. Outside</p> <p>10 the scope and calls for speculation.</p> <p>11 MR. BITTON: Objection to form.</p> <p>12 Lacks foundation. Calls for a legal</p> <p>13 conclusion and opinion. Outside the</p> <p>14 scope. Leading.</p> <p>15 THE WITNESS: Sorry, could you</p> <p>16 repeat the question?</p> <p>17 Q. It's fair to say that if you</p> <p>18 were to say that display and social were</p> <p>19 separate markets, that would be against</p> <p>20 Facebook's interests with respect to the</p> <p>21 antitrust scrutiny of Facebook?</p> <p>22 MS. PATCHEN: Same objections.</p> <p>23 This is far outside the scope of the</p> <p>24 questions.</p> <p>25 MR. BITTON: I'll state</p>	<p style="text-align: right;">Page 209</p> <p>1 S. Whitcombe</p> <p>2 and 24.</p> <p>3 Let me at least describe the</p> <p>4 document for the record.</p> <p>5 The first Bates number on the</p> <p>6 first page ends in 1326. The title is</p> <p>7 Network Bidding Agreement.</p> <p>8 MS. PATCHEN: I'm going to object</p> <p>9 to any questions about the network</p> <p>10 bidding agreement as outside of the</p> <p>11 scope of the topics that this witness</p> <p>12 has been designated to answer.</p> <p>13 MR. BITTON: Yeah, I'll state the</p> <p>14 same objection.</p> <p>15 And counsel, I'm warning you now</p> <p>16 because you're literally taking more</p> <p>17 time than you were allocated to cover</p> <p>18 deposition topics that were already</p> <p>19 covered in a prior deposition, so</p> <p>20 that's in contrast to court orders.</p> <p>21 MR. VERNON: We'll be brief.</p> <p>22 THE WITNESS: (Reviewing).</p> <p>23 Which page especially again?</p> <p>24 Q. 348 and 349.</p> <p>25 MS. PATCHEN: I also want to be</p>



## Google's Errata Sheet for Google's Counsel's Questions in the

## Transcript of the 30(b)(6) Deposition of Meta Platforms, Inc. (Simon Whitcombe) (September 28, 2023)

Page	Line	Now Reads	Should Read	Reason
9	10-11	other of half	other half	Transcription error
20	11	offer customers	offer its advertiser customers	Transcription error
21	9	advertising spaces	advertising space	Transcription error
24	6	users that Meta serves	users does Meta serve	Transcription error
26	3	the owned	its owned	Transcription error
28	18-19	app element	ad element	Transcription error
33	6-7	based on newspaper websites	placed on newspaper websites	Transcription error
38	5	advertiser counts	advertiser accounts	Transcription error
47	24	with underlined	with underline	Transcription error
52	6-7	gross the business	grows the business	Transcription error
69	3	advertising company	advertising customer	Transcription error
71	12	supplement	sub-bullet	Transcription error
74	6	one of	one to	Transcription error
98	9	or	for	Transcription error
214	3	provider programmatic	providers of programmatic	Transcription error
229	7	investments	investment	Transcription error
230	8	updating	obtaining	Transcription error
235	10-11	had a product had to reason to share their views on	as a product had a reason to share their views of	Transcription error
241	18	Google seven	Google Search	Transcription error

I have read the transcript of the 30(b)(6) deposition of Meta Platforms, Inc. for which Simon Whitcombe was the designated witness, and have listed all changes and corrections to my questions above, along with my reasons therefore.

**Date:** 11/1/2023

**Signature:**

